

## **REMARKS**

Reconsideration of this application in view of this response is respectfully requested. Claims 1-11 are currently in this case.

One aspect of the present invention is directed to a system and method for creating colorable line drawings. The system includes a computer, a video display, a printer for printing a line drawing on a sheet, means to feed into the computer the digital images to be converted, software for conversion of said images, and further means of transferring the digital image printed by the printer onto a substrate. The substrate may include paper, plastic, glass, wood, metal, T-shirts, or transparencies.

### **Claims 1-3 and 5-8**

Claims 1-3 and 5-8 have been rejected as allegedly being unpatentable under 35 U.S.C. § 102(e) in view of U.S. Patent 6,727,906 (Lockeridge).

Lockeridge discloses a computer, a video terminal, a printer, and a means to feed into the computer a digital image of the picture or design to be converted. The Examiner alleges that that Lockeridge also discloses "further means for transferring the digital image to a substrate. Applicant respectfully disagrees with this assertion.

Claim 1 requires a printer *and* a means for transferring a digital image or a printed sheet to a substrate. Lockeridge does not show any printing device in its system figure (*see, Fig. 10*), and mentions only a "color output device" on which an image can be output. *See, Lockeridge, col. 9 at line 9-10*. Lockeridge does not teach or suggest a separate means for transferring a digital image to a substrate such as a T-shirt, as explicitly required by claim 1. It is noted that the Office Action does not provide a reference to Lockeridge with respect to this claim element. This is another element of the claimed invention and should not be considered inconsequential, as asserted in the Office Action.

Thus, Lockeridge fails to teach or suggest one of the elements of claim 1, a means for transferring a digital image to a substrate. Accordingly, Lockeridge cannot anticipate claim 1, and allowance of claim 1 is respectfully requested.

Claims 2, 3, and 5-8 depend on claim 1 and thus incorporate its every limitation. Since Lockeridge does not anticipate claim 1, Lockeridge does not anticipate claims 2, 3, and 5-8. Accordingly, allowance of claims 2, 3 and 5-8 is respectfully requested.

#### **Claim 4**

Claim 4 has been rejected as allegedly being unpatentable under 35 U.S.C. §§ 102(e) or 103(a) in view of Lockeridge.

Claim 4 depends indirectly from claim 1, incorporating each limitation of claim 1. As previously described, Lockeridge fails to teach or suggest claim 1, and therefore also fails to teach or suggest claim 4. Accordingly, allowance of claim 4 is respectfully requested.

#### **Claims 9 and 10**

Claims 9 and 10 have been rejected as allegedly being unpatentable under 35 U.S.C. § 103(a) in view of Lockeridge and in further view of U.S. Patent 4,980,224 (Hare).

Claim 9 is an independent method claim, and includes the steps of printing a line drawing and also coloring the printed line drawing after the step of printing either before or after the printed line drawing is transferred to a substrate material. The Examiner has rejected claim 9 in view of Lockeridge. As previously mentioned, Lockeridge appears to disclose outputting an image to a "color output device." *See, Lockeridge, col. 9 at line 9-10.* Lockeridge does not teach or suggest the additional step transferring the printed line drawing to a substrate material, as required by claim 9, and as previously discussed with respect to claim 1. Hare also does not teach or suggest this step.

Thus, Lockeridge, Hare and/or the combination thereof, fails to teach or suggest one of the steps of claim 9, and does not render claim 9 obvious. Accordingly, allowance of claim 9 is respectfully requested.

Claim 10 depends on claim 9 and thus incorporates every limitation of claim 9. Since Lockeridge, Hare and/or the combination thereof does not render claim 9 obvious, Lockeridge, Hare and/or the combination thereof 9 does not render claim 10 obvious. Accordingly, allowance of claim 10 is respectfully requested.

#### **Claim 11**

Claim 11 has been rejected as allegedly being unpatentable under 35 U.S.C. § 103(a) in view of Lockeridge and Hare and in further view of U.S. Patent 5,756,875 (Parker).

Claim 11 depends on claim 9 and thus incorporates every limitation of claim 9. Since Lockeridge, Hare and/or the combination thereof does not render claim 9 obvious, Lockeridge, Hare and/or the combination thereof 9 does not render claim 10 obvious. Accordingly, allowance of claim 10 is respectfully requested.

As previously discussed, Lockeridge and Hare do not teach or suggest the additional step of coloring the printed line drawing after the step of printing either before or after the printed line drawing is transferred to a substrate material, as required by claim 9. Parker also does not teach or suggest this step. Accordingly, Lockeridge, Hare, Parker, and/or any combination thereof do not teach or suggest this step. Accordingly, allowance of claim 11 is respectfully requested.

#### **Conclusion**

It is believed that all objections set forth in the previous Office Action have been fully met, and favorable reconsideration and allowance are earnestly solicited. If, however, for any reason the Examiner does not believe that such action can be taken at this time, it is respectfully requested that the Examiner telephone applicant's attorney at (732-815-0404) to discuss any additional objections.

Respectfully submitted,

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By: 

Dated: June 6, 2006

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